

## UNITED STATES DISTRICT COURT

for the  
Southern District of Ohio

In the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)

Priority Mail Express, Label Number EJ 283 381 367 US, addressed  
to Amanda Thompson, 911 6<sup>th</sup> Ave, Middletown, Ohio 45044, with a  
return address of Adam James, 17803 Ness Dr., Canyon Country, CA  
91387.

Case No. 1:20-mj-441

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Priority Mail Express, Label Number EJ 283 381 367 US, addressed to Amanda Thompson, 911 6<sup>th</sup> Ave, Middletown, Ohio 45044, with a return address of Adam James, 17803 Ness Dr., Canyon Country, CA 91387.

located in the Southern District of Ohio, there is now concealed (identify the person or describe the property to be seized):

A quantity of a controlled substance and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Section 841(a)(1).

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☐ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

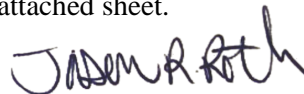
The search is related to a violation of: Title 21

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. 841 (a) (1)	Possession with intent to distribute a controlled substance

The application is based on these facts:

See attached affidavit of U.S. Postal Inspector Jason R. Roth

- ☒ Continued on the attached sheet.  
☐ Delayed notice \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

Jason R. Roth, U.S. Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.  
(Via FaceTime)

Date: June 19, 2020



Judge's signature

City and state: Cincinnati, Ohio

Karen L. Litkovitz  
United States Magistrate Judge

Printed name and title

## AFFIDAVIT

I, Jason R. Roth, having been duly sworn, depose and state:

1. I am a United States Postal Inspector, having been so employed since February 23, 2013. I am presently assigned to the Cincinnati Field Office, Pittsburgh Division of the United States Postal Inspection Service (“USPIS”) with investigative responsibility for southwest Ohio and northern Kentucky. Part of my investigative responsibility involves the use of the United States Mail in the illegal transporting of narcotics and other dangerous controlled substances and financial proceeds relating thereto.
2. I completed United States Postal Inspection Service Basic Training in May 2013. The training involved narcotic investigation techniques, chemical field tests and training in the detection and identification of controlled substances being transported in the United States Mail. In addition to this formal training, I have worked since May 2013 with various federal, state and local law enforcement agencies in the investigation of the transportation of illegal drugs and their identification.
3. This Affidavit is made in support of a search warrant for the following property, namely the packages associated with the following United States Postal Service (“USPS”) Priority Mail Express, Label Numbers:
  - a. **EJ 283 381 407 US**
  - b. **EJ 283 381 367 US** (the “**Subject Packages**”)

This Affidavit is made in support of a warrant to search the **Subject Packages** for evidence of a crime as well as contraband, fruits of a crime or other items illegally possessed in relation to the following offense:

- a. Possession with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code, § 841.

Because this Affidavit is submitted in support of the application of the United States to search the **Subject Packages**, it does not include every fact known concerning this investigation. I have set forth facts and circumstances that I have relied upon to establish probable cause to justify the issuance of a warrant to search the **Subject Packages**. The **Subject Packages** are currently being held at the USPIS Cincinnati Field Office.

4. Based on my training and experience, I have become aware that drug traffickers frequently use Priority Mail Express and/or Priority Mail, services offered by the USPS, to transport narcotics and other dangerous controlled substances. As a result of investigations and successful controlled substance prosecutions where Priority Mail Express and/or Priority Mail were used, I have learned of certain characteristics indicative of other Priority Mail Express and/or Priority Mail items previously identified as containing narcotics or other dangerous controlled substances. Some of these

characteristics include (but are not necessarily limited to or used on every occasion): false or non-existent return address, addressee is not known to receive mail at the listed delivery address, the package is heavily taped, the package is mailed from a known drug source location, labeling information contains misspellings, the label contains an illegible waiver signature, unusual odors emanating from the package, and the listed address is located in an area of known or suspected drug activity.

5. On or about June 18, 2020, I identified and intercepted the **Subject Packages** from the Cincinnati Processing and Distribution Center.

The **Subject Packages** are further described as:

**Priority Mail Express, Label Number:** EJ 283 381 407 US

Weighing approximately 2 pounds and 8 ounces in small brown box. Postage paid for was \$57.65.

**Sender:** Adam James  
18319 Oakmont Dr.  
Canyon Country, CA 91387

**Addressee:** Amanda Thompson  
911 6<sup>th</sup> Ave  
Middletown, Ohio 45044

**Priority Mail Express, Label Number:** EJ 283 381 367 US

Weighing approximately 3 pounds and 15 ounces in a small brown box.  
Postage paid for was \$64.50

**Sender:** Adam James  
17803 Ness Dr.  
Canyon Country CA 91387

**Addressee:** Amanda Thompson  
911 6<sup>th</sup> Ave  
Middletown Ohio 45044

6. I observed the **Subject Packages** and reviewed USPS tracking information, which indicated they were mailed from the Canyon Country Post Office, Canyon Country, CA 91387. I am aware through training and experience, southern California is a known drug source location and Middletown, OH is a known drug trafficking location.
7. I searched the CLEAR database for the listed return address of the **Subject Packages**: Adam James, 18319 Oakmont Dr., Canyon Country, CA 91387 and 17803 Ness Dr., Canyon Country CA 91387. CLEAR is a public record data investigative platform available exclusively to law enforcement and other government investigators about people and businesses. The information obtained from the system indicated there is no

Adam James associated with either address.

8. I searched the CLEAR database for the listed addressee of the **Subject Package**: Amanda Thompson, 911 6<sup>th</sup> Ave, Middletown, Ohio 45044. The information obtained from the system indicated there is no Amanda Thompson associated with that address.
9. On or about June 18, 2020, I arranged for Deputy Nick Poole, Hamilton County Sheriff's Office, to utilize a narcotics canine to check the **Subject Packages**. Deputy Poole and his canine "Akim" are a currently certified narcotics team. The team is certified by the Ohio Peace Officer Training Commission and the Ohio Office of the Attorney General. Deputy Poole reports that "Akim" passed all of his examinations and has successfully located hidden drugs in the past and therefore I consider "Akim" to be reliable. I met Deputy Poole at the USPIS Cincinnati Field Office, where the **Subject Packages** were placed separate offices among several other similar packages and presented to narcotic canine, "Akim", who alerted positively to the presence or odor of a controlled substance upon the **Subject Packages**. Attached herewith, and incorporated by reference, is a photocopy of the narcotic canine handler's record of examination.
10. Based upon my experience and training, this information, along with the positive alert of narcotic canine "Akim" is indicative of the **Subject Packages** containing narcotics or proceeds relating thereof.
11. Based upon the information contained in this Affidavit, I believe that there is probable cause to believe that the **Subject Packages** will contain evidence and/or contraband, fruits of crime, or other items illegally possessed. Therefore, a search warrant to open the **Subject Packages** is requested.

Further, your Affiant sayeth naught.



Jason R. Roth  
U.S. Postal Inspector

Subscribed and sworn to and before me this 19 day of June, 2020



Karen L. Litkovitz  
United States Magistrate Judge



United States Postal Inspection Service  
Pittsburgh Division

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**OFFICER AFFIDAVIT**

I, DEPUTY N. POOLE, AM, AND HAVE BEEN, EMPLOYED BY THE HAMILTON COUNTY SHERIFF'S OFFICE, SINCE 2004. AMONG OTHER DUTIES, I AM CURRENTLY THE ASSIGNED HANDLER OF NARCOTICS DETECTION CANINE "AKIM", WHICH IS TRAINED AND CERTIFIED IN THE DETECTION OF THE PRESENCE OR ODOR OF NARCOTICS DESCRIBED AS FOLLOWS:

Marijuana, Hashish, Cocaine, Heroin, Methamphetamines, Ecstasy


ON 06/18/2020, AT THE REQUEST OF POSTAL INSPECTOR J.R. ROTH I RESPONDED TO THE US POSTAL INSPECTION SERVICE CINCINNATI FIELD OFFICE WHERE "AKIM" DID ALERT TO AND INDICATE UPON THE FOLLOWING DESCRIBED ITEMS:

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USPS Priority Mail Express, USPS Label Number: EJ 283 381 367 US, addressed to Amanda Thompson, 911 6<sup>th</sup> Ave, Middletown Ohio 45044 with a return address of Adam Jones, 17803 Ness Dr., Canyon Country CA 91387

USPS Priority Mail Express, USPS Label Number: EJ 283 381 407 US, addressed to Amanda Thompson, 911 6<sup>th</sup> Ave, Middletown Ohio 45044 with a return address of Adam James, 18319 Oakmont Dr., Canyon Country, CA 91387.

BASED ON MY TRAINING AND EXPERIENCE AND THAT OF "AKIM", I CONSIDER THE ABOVE DESCRIBED ITEMS TO CONTAIN WITHIN OR UPON THE PRESENCE OR ODOR OF A NARCOTIC OR OTHER DANGEROUS CONTROLLED SUBSTANCE.

  
(Signature and Date)

Cincinnati Field Office  
895 Central Avenue, Suite 400  
Cincinnati, OH 45202-5748  
Telephone: 513-684-8080  
FAX: 513-684-8009